

BARCLAY DAMON ^{LLP}

Gabriel M. Nugent
Partner

November 16, 2021

BY CM/ECF

Honorable David N. Hurd
United States District Court
Northern District of New York
10 Broad Street
Utica, New York 13501

Re: U.S. v. Zourdos, et al.
Docket No. 5:20-CR-00298-003

Dear Judge Hurd:

I am writing to request an extension of the schedule for post-trial motions in this matter. David M. Garvin, counsel for John and Helen Zourdos, joins in this request.

Post-trial motions are currently due on November 24, 2021, with the government's opposition due on December 3, and replies on December 10. We understand from Lisa Mazzei that the trial transcript will not be available – even on an expedited basis – until after November 24.

We have conferred with John Kane and Michael Perry, who advised that the government does not object to our request. To avoid conflicts with upcoming trial commitments, all parties request that the Court approve following post-trial motion schedule:

- January 10, 2022 – all defense motions due (Rule 29, 33 and 34);
- February 7, 2022 – government opposition due;
- February 22, 2022 – defense replies due; and
- Oral argument to be set by the Court.

Honorable David N. Hurd
November 16, 2021
Page 2

Thank you for your consideration of this request.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'G. M. Nugent', with a stylized flourish at the end.

Gabriel M. Nugent

GMN:gn

cc: All counsel of record
Via CM/ECF